

1 Marc V. Kalagian
2 Attorney at Law: 4460
3 211 East Ocean Boulevard, Suite 420
4 Long Beach, CA 90802
5 Tel: (562)437-7006
6 Fax: (562)432-2935
7 E-Mail: rohlfig.kalagian@rksslaw.com
8 Attorneys for Plaintiff
9 JOSEPH SARUBY

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JOSEPH SARUBY)	Case No.: 2:17-cv-00150-CWH
)	
13 Plaintiff,)	STIPULATION TO EXTEND TIME
14 v.)	TO FILE MOTION FOR REVERSAL
)	AND/OR REMAND
15 NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security.)	(SECOND REQUEST)
)	
16 Defendant.)	
)	
17 _____)	

18
19 Plaintiff Joseph Saruby and Defendant Nancy A. Berryhill, Acting
20 Commissioner of Social Security (“Defendant”), through their undersigned counsel
21 of record, hereby stipulate, subject to the approval of the Court, to extend the time
22 for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to December 28,
23 2017; and that Defendant shall have 30 days or until January 26, 2018, to file her
24 opposition, if any is forthcoming. Any reply by plaintiff will be due February 15,
25 2018.

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1 Counsel requires an extension due to several motions being due at one time,
2 the impending holiday season, and to properly manage in order to properly present
3 the issues in the administrative record. Counsel sincerely apologizes to the court
4 for any inconvenience this may have had upon it or its staff.

5
6
7 DATE: November 21, 2017 Respectfully submitted,
8 ROHLFING & KALAGIAN, LLP

9 /s/ *Marc V. Kalagian*

10 BY: _____
11 Marc V. Kalagian
12 Attorney for plaintiff Mr. Joseph Saruby, Jr.

13 DATE: November 21, 2017 STEVEN W. MYHRE
14 Acting United States Attorney

15 /s/ *Sharon Lahey*

16 BY: _____
17 Sharon Lahey
18 Special Assistant United States Attorney
19 Attorneys for defendant Nancy A. Berryhill
20 [*authorized by e-mail]

21 DATED: November 22, 2017

22 IT IS SO ORDERED:

23 _____
24 UNITED STATES MAGISTRATE JUDGE
25
26

1 **CERTIFICATE OF SERVICE**
2 **FOR CASE NUMBER 2:17-CV-00150-CWH**

3 I hereby certify that I electronically filed the foregoing with the Clerk of the
4 Court for this court by using the CM/ECF system on November 21, 2017.

5 I certify that all participants in the case are registered CM/ECF users and
6 that service will be accomplished by the CM/ECF system.

7
8 */s/ Marc V. Kalagian*

9 _____
10 Marc V. Kalagian
 Attorneys for Plaintiff